



**MCI Telecommunications
Corporation**

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EX PARTE OR LATE FILED

Mary L. Brown
Senior Policy Counsel
Federal Law and Public Policy

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JAN 26 1999

January 26, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: EX PARTE in Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, CC Docket No. 96-115; Implementation of the Non-Accounting Safeguards of Sections 271 and 272, CC Docket No. 96-149 /

Dear Ms. Salas:

On January 22, 1999, MCI WorldCom, Inc. met with staff members of the Common Carrier Bureau to discuss the above-captioned proceedings. Present at the meeting were Margaret Egler, Bill Agee, Peter Wolfe, Anthony Mastano, and Eric Einhorn. Representing MCI WorldCom, Inc. were Lanese Jorgenson, Sherry Lichtenberg, and myself. Attached are the presentation materials that were provided to staff at the meeting.

Sincerely,

Mary L. Brown

CC: Margaret Egler
Bill Agee
Peter Wolfe
Anthony Mastano
Eric Einhorn

CPNI Rules:
New York local marketing
experience

CC Docket Nos. 96-115, 96-149

Presentation by MCI WorldCom

January 22, 1999

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Sales process

- Outbound telemarketing representative calls a prospect
- If the prospect responds positively to the sales proposition:
 - rep must ask permission to query Bell Atlantic Customer Service Record (CSR)
 - the representative queries the CSR through the GUI interface

Bell Atlantic CSR

- MCI WorldCom has “stripped” the CSR of its CPNI content. Our reps see only:
 - Customer name
 - Billing telephone number
 - Address
 - Directory listing information
- Reps do not see:
 - Features, spending levels, any other CPNI

Order processing

- To install customer, MCI WorldCom must “recreate” local service data from scratch
 - Match customer names (our data vs. BA’s)
 - Match customer address (our data vs. BA’s)
 - Billed phone number v. working phone number
 - Features
 - Inside wire contract

Impact on MCI WorldCom

- Can't sell features or inside wire maintenance plan as well as the incumbent can
- Can't sell other services within the local "total service offering" as well as incumbent can
- Can't notify the customer of features that the customer has forgotten or doesn't know that they have -- e.g., ISW contracts (55% take rate in NY)
- Can't "match" the services that the customer has with incumbent

Submission of local order to BA

- MCI verifies information and transmits to BA for installation
- If the local order is not correct, the order is rejected
- BA creates new CSR, takes old CSR out of its system, and passes new record to MCI WorldCom

NY: “Best price” rule

- In NY, the PSC says the local customer is entitled to make an informed choice in local providers, including rate information
- Without access identical to what incumbent has (name, address, directory listing, features, other services), accurate comparison information cannot be provided

BA 272 affiliate has lots of CPNI advantages

- 272 affiliate can engage in local and long distance
- No consent required
 - Immediate access to: name, address, billing phone, working phone, directory listing information, features, inside wire agreement, usage information

Lessons

- Allow new entrants to use CPNI to initiate service
 - Customers deserve price comparisons and detailed product disclosure
 - For purposes of initiating service, we do not need usage CPNI
- For all other purposes, require both Bell 272 affiliates, and new entrants, to obtain most CPNI upon oral consent

Go to [Service Request Page](#)

Customer Service Record

[View the RAW EIF File](#)

| Administrative Data Table | | | | |
|--------------------------------------|----------------------|--------------------------|--------------------|---------|
| Billing Telephone Number | | | 2128316684 | |
| Customer Indicator | | | R | |
| Version | | | AA | |
| Customer Negotiator Name | | | Sherry Lichtenberg | |
| Purchase Order Number | | | 19990115152943 | |
| Customer ID | | | MCIL | |
| Customer Negotiator Telephone Number | | | 3013603412 | |
| Business Segment | | | R | |
| Customer Service Record | | | | |
| Billing Telephone Number | | | 2128316684 | |
| Multi-Line Text | | | | |
| 212 831-6684 | | | 732 | M |
| | | | | 2 |
| | | | | 1- |
| | | | 1MR | ACCOUNT |
| | | | ACCOUNT | Q11 |
| LN | SCARDINO, K | | I | 8-6-98 |
| LA | (OAD) 1755 YORK AV, | | | |
| | MANHATTAN, NY+ 10128 | | I | 8-6-98 |
| LOC | FLR 18/APT 18F | | I | 8-6-98 |
| | ---DIR | | | |
| DEL | 1,1 | | I | 8-6-98 |
| | ---BILL | | | |
| BN1 | KIMBERLY SCARDINO | | | 8-10-98 |
| BA1 | APT 18F | | | 8-10-98 |
| BA2 | 1755 YORK AV | | | 8-10-98 |
| PO | NEW YORK NY | | | |
| | 10128 | | | 8-10-98 |
| LB | 01000 | | | |
| STI | LSSA 07-06-98 | | | |
| SS | 186-60-3649KS, Y | | | 8-6-98 |
| TAR | 002 | | | |
| | ---S&E | | | |
| 1 | 1MR | /TBE A/PIC NONE/PCA FN, | | |
| | | 07-06-98/LPIC NONE | | |
| | | /LPCA FN, 07-06-98 ++FCC | | |

LINE CHARGE++

| | | | |
|---|-------|--------------------------------------|------------|
| | | (Monthly Charge for Dial | |
| | | Tone) | T 12-28-98 |
| 1 | ESX | (Call Waiting) | T 8-6-98 |
| 1 | PSEBO | /PROX Y (Access Code Restriction) | I 12-28-98 |
| 1 | RBZXL | /LCC JTB (Blocking Service Charge) | I 12-28-98 |
| 1 | VMH3A | /RCYC 3/MWI /CFNB 212 | |
| | | 369-6608/CFND 212 | |
| | | 369-6608 (Home Voice Mail Advantage) | T 8-6-98 |
| | | ---IN SERVICE | |
| 1 | 9ZR | FCC LINE CHARGE | |
| | | ---LOCAL SERVICE | |
| | | AMOUNT SUBJECT TO FED & | |
| | | LOC TAX | |
| | | AMOUNT NOT SUBJECT TO | |
| | | FED & LOC TAX | |
| | | AMOUNT SUBJECT TO FED | |
| | | NOT LOC TAX | |
| | | AMOUNT SUBJECT TO LOC | |
| | | NOT FED TAX | |
| | | ---PURCHASE ORDER NUMBERS | |
| | | C1XA5998Q 12-28-98 | |
| | | C2JD3790Z 12-29-98 | |